

AIRS MOU Requests from Non-Governmental,
Public Service and Secondary Responder Organizations
Presented to Statewide Interoperability Executive Committee
October 19, 2010

Summary

The Arizona Department of Public Safety (DPS) requests recommendations from the Statewide Interoperability Executive Committee (SIEC) on a policy enabling use of the Arizona Interagency Radio System (AIRS) by appropriate Non-Governmental, Public Service and Secondary Responder Organizations, referred to herein collectively as NGOs.

Background

AIRS radio frequencies are used in the event of multi-agency, multi-discipline, and/or multi-jurisdictional operations requiring the use of the common radio channel(s), specifically for the purpose of coordinating activities during identified incidents.

Agencies and organizations wishing to operate on AIRS must sign a Memorandum of Understanding (MOU) with DPS, which holds the licenses for AIRS frequencies. The MOU currently states that Governmental agencies and non-governmental organizations, utilizing mobile and portable two-way radios, operated by personnel actively engaged in incident-related activities, are eligible to apply for operating authority pursuant to this MOU.

The current AIRS Standard Operating Procedures (SOP) document (approved by SIEC and the Public Safety Communications Advisory Commission (PSCC)) states that AIRS is designed to provide interoperable communications capability to first responders of police, fire, and EMS agencies, as well as other personnel of municipal, county, state, tribal, and federal agencies performing public safety or public service activities. It further states that DPS may also determine that selected non-governmental organizations performing public safety or public service activities are eligible for approval to use AIRS.

Request

DPS is requesting input from the SIEC regarding a policy it could implement that fairly and uniformly provides access to AIRS for appropriate NGOs, while protecting the effective use of AIRS as a statewide interoperability resource.

NGOs to be covered by such a policy would include such diverse entities as animal rescue groups, ski patrols, hospitals, volunteer search and rescue groups, and organizations identified in emergency plans as playing a role in emergency response.

At this time, DPS has a specific request for an AIRS MOU from the Show Low branch of the Arizona Rangers. In addition, other NGOs have made informal inquiries regarding usage of AIRS to PSIC staff in their outreach throughout the State. DPS wishes to put a policy

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addressing NGO usage of AIRS developed through a statewide consensus process in place before acting on any such requests.

At its August 17, 2010 meeting, the SIEC directed PSIC staff to develop a draft policy based on feedback at that meeting for DPS to fairly and uniformly enable use of AIRS by Non-governmental, Public Service and Secondary Responders. DPS has agreed that it will act promptly on a draft policy when received and process any outstanding requests in as timely a manner as possible.

Considerations

Some specific concepts which have been considered in regard to such a policy include:

1) Ability to extend coverage of an MOU with a government authority to cover NGOs secondarily could be considered.

We researched this option and found that since the MOU is primarily an FCC licensing agreement, it requires the direct agreement between DPS (the licensee) and the signing agency.

2) Inclusion of public safety or service NGOs within existing State plans could be reviewed for guidance.

We reviewed the State Emergency Response and Recovery Plan (SERRP) to see it would enable a concise way to identify some eligible NGOs. There are some NGOs designated as primary agencies under the SERRP so that designation may be helpful – see Addendum. We found that the inclusion of all “secondary agencies” identified in the SERRP would have included too many agencies – see Addendum.

3) The utility of establishing a SIEC review committee could be considered (similar to the NIMS Communications Unit (NIMS-CU) Workgroup).

We think such a committee has a role in reviewing requests when DPS requests that review.

4) Governmental emergency management agencies responsible for implementing emergency plans could be required to sponsor or endorse NGOs as essential to their emergency response plans and therefore appropriate AIRS users.

The sponsorship approach is the most viable. It enables local jurisdictions to identify selected NGOs to communicate with during emergency response based on local need and fosters the establishment of an agreement between the primary public safety agency managing the AIRS frequencies (DPS) and the NGO in advance.

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DRAFT MOU Policy

The following criteria are recommended for use in determining eligibility by NGOs for entering into an MOU with DPS for AIRS use:

An NGO who meets the following 2 criteria may petition DPS to enter into an MOU in regard to AIRS:

1. The NGO has the express written support of a recognized government agency that is responsible for emergency management plans for its jurisdiction.

An MOU signed by any NGO must contain the endorsement of the supporting agency. If a supporting agency withdraws its support in writing to DPS, DPS will cancel the AIRS MOU with the NGO.

The jurisdiction supporting the NGO must match the area for which the NGO is requesting AIRs usage. For example, a local city's endorsement is not sufficient to support countywide usage nor is a county's endorsement sufficient to support multi-county or statewide usage. For NGOs proposing multi-county usage, multiple endorsement letters are required.

2. The NGO serves a critical public safety role as determined by DPS in that jurisdiction including the need for direct public safety incident communications.

DPS may request concurrence from the SIEC in the event that the criticality of the NGOs public safety role warrants review.

Question to SIEC: Can a committee be formed to review these requests when submitted?

Question to SIEC: Could an alternative test be an automatic inclusion of agencies listed as primary in the SERRP? Would they also have to exhibit an obvious need for direct public safety incident communications?

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Agencies with Current MOUs

The following NGOs agencies currently have signed MOUs with DPS. If the recommended policy is adopted, these entities would require a supporting agency sign-off within a reasonable period of time (perhaps 60 days):

- Catholic Healthcare West - East Valley
- Arrowhead Mobile Healthcare, Inc.
- John C. Lincoln Deer Valley Hospital
- Summit Healthcare
- Yuma Regional Medical Center
- AZ Public Service Company (APS)
- Tucson Electric Power Co - Springerville
- Tucson Airport Authority
- Arizona Wing, Civil Air Patrol
- Phoenix Children's Hospital

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Addendum
Review of State Plans

We reviewed the SERRP Plan and determined that all of the following NGOs are listed as either primary or secondary responsible parties. For the primary agencies, DEMA has identified them as instrumental in the emergency response plan - would they also be required to show a need for direct public safety incident communications. For the secondary agencies, the list includes many organizations that would likely not require use of AIRS, it is recommended that we do not use this designation as criteria for a policy on NGOs.

Primary Agencies

- American Red Cross (ARC)
- Arizona Humane Society (AZHS)
- Arizona Public Service (APS) - Palo Verde Nuclear Generating Station (PVNGS)
- Arizona State Citizen Corps Council (AZCCC)
- Arizona Veterinary Medical Association (AZVMA)
- Arizona Voluntary Organizations Active in Disasters (AzVOAD)
- Make A Difference (MAD)
- Volunteer Center of Southern Arizona (VCSOAZ)

Secondary Supporting Agencies

- Amateur Radio Emergency Services (ARES)
- Amateur Radio Relay League (ARRL)
- American Chemistry Council (ACC) - Chemical Transportation Emergency Center (CHEMTREC)
- American College of Surgeons (ACS)
- American Veterinarian Medical Association (AVMA)
- Aristatek - Palmtop Emergency Action for Chemicals (PEAC)
- Arizona Cattlemen's Association
- Arizona Chapter of the American College of Emergency Physicians (AzCEP)
- Arizona Fire Chiefs Association (AFCA)
- Arizona Medical Association (ARMA)
- Arizona Nurses Association (AZNA)
- Arizona Osteopathic Medical Association (AOMA)
- Arizona Pharmacy Alliance (AzPA)
- Arizona Pork Council
- Arizona Poultry Industry Representative

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Arizona State Bar Association
Arizona State Horsemen's Association
Arizona Statewide Independent Living Council (SILC)
Associated General Contractors of Arizona (AGCA)
Association of School Nurses (ASN)
Chemical Biological Response Aide (CoBRA)
Chlorine Institute
Citizens Corps Program (CCP)
Civil Air Patrol (CAP)
Community Emergency Response Teams (CERT)
Defense Group Incorporated
Emergency Department Nurses Association (ENA)
Kinder Morgan Energy Partners
Livestock Markets
Livestock Slaughter Establishments
Medical Reserve Corps (MRC)
Mental Health Association of Arizona (MHAAZ)
Military Amateur Radio Systems (MARS)
Operation Respond Emergency Information System / Emergency Services
Information Network Corporation (OREIS/ESINC)
Public/Private Utility Companies
Radio Amateur Civil Emergency Services (RACES)
Salt River Project (SRP)
Society for the Prevention of Cruelty to Animals (AZSPCA)
Society of St. Vincent De Paul (SVDP)
State-Approved (ADOA) Emergency Response Contractors
Structural Engineers Association of Arizona (SEAOA)
The Fire Corps (TFC)
The Salvation Army (TSA)
United Blood Services (UBS)
United Dairymen of Arizona
USAonWatch
USDA Accredited Veterinary Practitioners
Visual Data - HazMat 2000
Volunteer Sheriff Organizations
Volunteers in Police Services (VIPS)